

A Model Environmental Code of Practice for Forest Land Management

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Responsibility
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November, 1989**

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I. INTRODUCTIONA. CHURCH CONCERNS ABOUT FOREST LAND MANAGEMENT

In late February 1989, the Taskforce on the Churches and Corporate Responsibility, in cooperation with the Centre for the Study of Religion in Canada at Emmanuel College, organized a consultation on Environmental Codes of Practice for Forest Land Management. The consultation was part of the Taskforce's on-going activities in forest-related issues.

The churches' concern about forest land management practices reflects Christian attitudes about the integrity of Creation, responsibility for its care and the social impact of forest land management practices.

That these concerns are increasingly important to the churches is reflected in the decision of the 1983 Vancouver Assembly of the World Council of Churches to make "Integrity of Creation" a central theme of the Council in the period leading up to its next Assembly, to be held in Australia in 1991. As a recent WCC discussion paper on the Integrity of Creation points out, Christians must recognize our dependence upon Creation, the interrelatedness of all elements of Creation, the wholeness or universality of Creation and the special responsibilities for stewardship of Creation in all of its diversity. The paper reminds us that, "Though human eyes may not always discern it, every creature and the whole creation in chorus bear witness to the glorious unity and harmony with which the creation is endowed."¹

In a submission to the Federal Department of Justice on the Law Reform Commission of Canada's Working Paper on Crimes Against the Environment, the Taskforce wrote in 1986:

We have a dual relationship with the environment. On the one hand, we live in it as one part of all creation. On the other hand, we have the responsibility as stewards of caring for it as God would.

As stewards, we do not "own" the environment but hold it in trust for God and the rest of creation. Thus we cannot do with it as we please, and any violence done to it is similar to damaging or destroying another's property.

The role of the steward, however, does not entail only "minding the store". We have a calling to make the environment productive. We also have the obligation of challenging those approaches and practices which threaten the integrity of the environment for all creatures, human and non-human.²

¹ World Council of Churches: Integrity of Creation: An Ecumenical Discussion. Justice, Peace and the Integrity of Creation Resource Materials 3.2, 26pp., mimeo., no date.

² David Hallman, Chairman, Eco-Justice Sub-Committee, Taskforce on the Churches and Corporate Responsibility to M.A. Prabhu, Senior Counsel, Criminal Law Review and Chief, Environmental Law, Protection of Life Project, Department of Justice, 1986.7.16.

B. ENVIRONMENTAL CODES OF PRACTICE FOR INDUSTRY

The basis of the Taskforce's work is a belief in the principle of corporate responsibility. Even where corporations operate on crown lands under government regulation, as is often the case in forestry, the fulfilment of legal obligations can not be equated with the fulfilment of ethical responsibilities for care of the environment and for social justice.

The churches' theological and spiritual concern for the environment, and for forest land management in particular, exists within a broader social context which places growing expectations upon the private sector to accept responsibility for the environmental consequences of its activities.

As the Environmental Guidelines of the International Chamber of Commerce note, "In the field of environmental protection, industry has both economic and social responsibilities".³ How can Canadian forest products companies meet these obligations with respect to both crown and private forest lands which they manage?

The Taskforce has chosen "Codes of Practice" as a tool for clarifying its understanding of the responsibilities of forest sector companies. This approach reflects the Taskforce's previous experience with Codes of Practice for investment in South Africa and Chile and for loans by Canadian banks as well as its belief that codes of practice help elucidate companies' obligations.

The suggestion that forest sector companies, in particular, should have environmental codes of practice grows out of recommendations contained in the Report of the National Task Force on Environment and Economy and, indirectly, the National Forest Sector Strategy for Canada.⁴

The Report of the National Task Force on Environment and Economy, released in September 1987, stressed that "given the recognition that environmental considerations are essential to social and economic planning, Canada's cabinet chambers and boardrooms must assume new responsibilities". It contains two recommendations with clear implications for the forest industry:

2.7 Individual companies should adopt and implement environmental principles and policy guidelines...

2.8 Companies which have an impact on the environment should provide their boards of directors with annual reviews on environmental performance and the implementation of their environmental principles and

³ International Chamber of Commerce: Environmental Guidelines for World Industry. Paris: International Chamber of Commerce, 1986.

⁴ Report of the National Taskforce on Environment and Economy. Downsview, Ontario: Canadian Council of Resource and Environment Ministers. 18pp., 1987; Canadian Council of Forest Ministers: A National Forest Sector Strategy for Canada. Ottawa: Department of Supply and Services. 22pp., 1988.

policies in order to ensure that those responsible for corporate direction are fully informed.

And the National Forest Sector Strategy for Canada, developed under the auspices of the Canadian Council of Forest Ministers through a consultative process involving individuals from environmental and conservation groups, industry, universities, labour, and government, recommended that:

"all elements of the forest sector assist in the development of provincial conservation strategies, endorse these strategies where appropriate, and ensure that forest management goals and practices meet requirements for sustainable development."

Canada's forest industry draws its wood supply primarily from crown land where its operations are subject to provincial legislation and regulation. The ultimate responsibility for care of crown forests rests with their owners, in most cases provincial governments, and corporate forest land management is set within this legal and regulatory context.⁵ Despite this, industry remains responsible for the ethical conduct of its harvesting and associated operations. The responsibility for ethical conduct above and beyond legal obligations is magnified by the trend in some provinces toward granting industry long-term management rights to crown forest land through tenures such as Tree Farm Licences and Forest Management Agreements.

C. CONSULTATION PROCESS

A survey of Canadian forest sector companies conducted by the Taskforce in 1986 and 1987 found that few have environmental codes of practice or forest management policies which contain significant environmental criteria.

To facilitate its discussions with industry about codes of practice, the Taskforce, in cooperation with the Centre for the Study of Religion in Canada at Emmanuel College, convened a two-day consultation to identify what elements might appropriately be included in an environmental code of practice for forest land management. On the first day of the consultation, a small working group of foresters and church representatives drafted an initial version of a code. On the second day, thirty people representing various perspectives on forest use met to offer comments of the initial draft. [List of participants appended.]

Using the code produced on the first day of the consultation as a starting point, a draft version of the code was prepared by Taskforce staff to facilitate further discussion. It incorporated comments from the second day's larger group discussion, as well as material from environmental policies and codes of practice of forest sector companies, industry associations from other sectors, the International Chamber of Commerce and the World Conservation Strategy of the International Union for the Conservation of Nature and Natural Resources. The draft paper was then circulated to consultation participants and other forest stakeholders for comment.

⁵Several people who commented on the paper pointed out that in addition to government and industry, professional foresters have important and direct ethical responsibilities for forest land management.

This document represents neither a complete consensus of the participants in the consultation nor all of the views expressed by subsequent reviewers, though it draws heavily on both sources. Rather it is a statement by the Taskforce on the Churches and Corporate Responsibility of its understanding of the implications of the churches' concern for the integrity of creation as applied to forest land management. It is also a means of helping the churches clarify an ethical framework for forest land management practices by the private sector. As forest sector companies accept the importance of environmental codes of practice and develop codes suitable to their own operations, this document will have the added role of a tool for discussion and critique of company codes.⁶ The Taskforce will be using it in its ongoing dialog with forest sector companies regarding environmental codes of practice.

The code is divided into four parts: general principles; land use decision making; forest land management; and implementation, review and accountability. The first section establishes broad criteria involving all aspects of company planning and operations. The second section, land use decision-making, focuses on corporate responsibility for decisions about the allocation of forested land to various social, environmental and economic uses. Section three is concerned with how forest land is managed after it has been allocated for timber production and the final section on implementation, review and accountability deals with putting the code into practice, and assessing and reporting on its implementation.

⁶Since the consultation, the Canadian Pulp and Paper Association, Fletcher Challenge Canada, MacMillan Bloedel, and Abitibi Price have published environmental policy statements and several other companies have announced their intention to create similar policies. Also in 1989, Fletcher Challenge Canada and Canadian Forest Products were the first companies in the forest sector to appoint vice presidents responsible for the environment.

II. DRAFT ENVIRONMENTAL CODE OF PRACTICE FOR FOREST LAND MANAGEMENTA. GENERAL PRINCIPLES

- | | |
|--|--|
| WORLD
CONSERVATION
STRATEGY | 1.1 The company will, in its planning and operations, act in accordance with the objectives and principles of the World Conservation Strategy. |
| DEPENDENCE | 1.2 The company recognizes that its continuing financial success is dependent on the health of the forest. It also recognizes that a healthy global ecosystem, today and in the future, depends on maintaining the integrity of the forest environment and that care of the forests is a global responsibility. |
| PRIMARY
CONSERVATION | 1.3 The company recognizes the intrinsic value of the forest environment (soil, water, air, flora, fauna) in addition to its economic and social value. |
| ACCEPT ECONOMIC
COSTS OF
ENVIRONMENTAL
CODE | 1.4 The company accepts that costs may be incurred and investments may be required to meet the spirit as well as the letter of the code. |
| SHARED
RESPONSIBILITY
WITH GOVERNMENT | 1.5 Where it operates on crown land, the company recognizes that responsibility for management is shared with government. The company will comply with government regulations and guidelines established to protect the environment. The company will encourage high standards of environmental protection through government regulation where appropriate. |
| NOT LIMITED TO
LEGAL
OBLIGATIONS | 1.6 The company will not limit its responsibility to the environment solely to what is required by law but will continually strive to exceed the requirements of law in meeting the objectives of this code. |
| ABORIGINAL AND
TREATY RIGHTS | 1.7 The company will respect the title and rights of aboriginal peoples and will not engage in new or accelerated industrial development, including forest harvesting, on unsurrendered lands without agreement with the affected native people. On land where treaty rights exist, the company will actively seek and accept the participation of aboriginal peoples in managing the protection of the environment. |

FOREST
DEPENDENT
COMMUNITIES

1.8 The company recognizes its responsibility to provide affected communities with adequate advance public notice of changes to operations which will result in reductions in employment. The company will consider the social consequences of forest management and will make a positive contribution toward the economic well being and quality of life of forest-dependent communities.

PROCESS FOR
RESOLVING
CONFLICT

1.9 Where conflict over forest use or management arises, the company will seek to resolve those conflicts through processes which recognize the public's right to participate in decision making.

B. LAND USE DECISION MAKING

INTEGRATED USE

2.1 The company recognizes that on some lands with the potential for commercial timber production, other forest uses and environmental conditions may preclude harvesting or require modified harvesting.

PUBLIC ROLE IN
DECISION-MAKING

2.2 The company acknowledges the right of all stakeholders to participate in decisions about forest use and supports the principle of funding public groups engaged in the forest land use decision-making process.

ACCESS TO
INFORMATION

2.3 The company acknowledges the public's right of access to all relevant information, in a meaningful and understandable form, on which land use decisions are based.

IDENTIFY
ENVIRONMENTAL
VALUES

2.4 The company will identify or encourage the government to identify all environmental values and ecosystems on land being considered for forest harvesting.

ASSESS
CUMULATIVE
EFFECTS

2.5 The company recognizes the requirement for assessment of cumulative environmental effects of all land use activities as a regular part of land use planning.

C. LAND MANAGEMENT PRINCIPLESOPERATIONS
RESPECT LIMITS
OF FOREST
(PRIMARY
CONSERVATION)

3.1 All forest activities, including silviculture, harvesting, protection, and improvement operations, will be guided by the inherent characteristics, biological capacity and diversity, and environmental quality of each ecosystem to maintain the resource at a biologically sustainable level.

INTEGRATED USE (SECONDARY CONSERVATION)	3.2 The company will manage forests which are primarily dedicated to timber production in a manner which allows for a variety of benefits to society. Establishment by provincial governments of measurable management objectives for consumptive and non-consumptive uses on land and water in areas under company management will be encouraged.
COMPREHENSIVE PLANS	3.3 Management objectives, procedures and operational standards, as well as environmental concerns and related mitigation requirements, for each management unit are to be specified in comprehensive management and working plans.
MITIGATION	3.4 Company operations will be conducted in a manner which minimizes or mitigates adverse effects on the terrestrial and aquatic environment.
UNDERSTANDING FOREST ECOLOGY	3.5 The company will seek to understand the structure, function and composition of the forest ecosystem and apply this understanding in planning its harvesting and silviculture operations.
MODIFY PRACTICES	3.6 The company will modify or improve practices in the light of new knowledge and understanding of the forest ecosystem.
COMPREHENSIVE INVENTORY DATA	3.7 The company will base its plans and operations on comprehensive inventory data including ecosystem classification, floral and faunal habitat (including aquatic resources) and forest structure, composition, growth and dynamics.
ASSESS IMPACT OF ALTERNATIVES	3.8 The company will assess the impact of alternative management procedures on all forest resources as an aid to resolving resource conflicts.
RESEARCH	3.9 The company acknowledges its responsibility, shared with government and universities, to address deficiencies in existing data and knowledge of ecosystem processes through the development and funding of research programmes, and to communicate the results of this work to all interested parties and the general public.
PRIVATE LAND	3.10 Where company timber supplies come from private land not under their management, the company will encourage land owners to follow sound environmental practices.
RECYCLING	3.11 The company will actively promote recycling to reduce the demand on forest resources.

CONTRACTORS
SUBJECT TO CODE

3.12 Contractors working on the company's behalf will be subject to the environmental code of practice.

D. IMPLEMENTATION, MONITORING AND ACCOUNTABILITY

IMPLEMENTATION

4.1 The company will undertake specific measures to implement the environmental code of practice, including modification of company practices to correspond with the code, establishment of measurable resource management objectives and training and education of employees and contractors.

ANNUAL REVIEW
AND REPORT

4.2 The company will annually review and report on its performance with respect to the environmental code of practice and make this report available to directors, shareholders, employees, appropriate government agencies and the general public. Information contained in the report will be presented on an area basis corresponding to management agreements and tenures. The report will address the achievement of resource management objectives and standards of forestry practice and will be signed by a registered professional forester or forest engineer (as appropriate, depending upon province). Corrective action will be taken to address deficiencies identified in the annual report.

CLEARLY ASSIGN
RESPONSIBILITIES

4.3 The company will clearly assign responsibilities for development, implementation, annual reporting, periodic auditing, reporting, updating of practices and procedures and taking corrective action regarding the environmental code of practice.

UPDATING
PROCEDURES

4.4 Procedures will be established for revising and updating the code of practice and company plans and procedures to take into account results of the annual review.

INDEPENDENT
ENVIRONMENTAL
AUDITS

4.5 The company will provide for the conduct of periodic audits of its implementation of the environmental code of practice by an independent auditor.

INFORMATION

4.6 Information on company environmental performance will be made available to the public. The company will make an effort to identify local community groups effected by company operations and make information available to them.

SUPPORT FOR
EMPLOYEE
CONCERNS

4.7 The company will encourage employees to express concerns about the environmental practices of the company.

III. DISCUSSION COMMENTS ON THE ENVIRONMENTAL CODE OF PRACTICE

The following section presents the text of the environmental code of practice for forest management accompanied by a short discussion based on the consultation and subsequent comments made on drafts of this paper by consultation participants and others. Quotes from corporate and public policy documents accompany appropriate sections of the code. (These texts are indented and the company or organization from which they are drawn is indicated in brackets. A key to these is in the second appendix.)

Where a strong lack of consensus was expressed among consultation participants we have attempted to present their conflicting views. The policy statements provide representative samples of existing policies, but not necessarily policies which fulfil the intent of the code of practice.

A. GENERAL PRINCIPLES

Sustained yield has been a fundamental guiding principle of modern Canadian forest policy. Yet sustained yield policies and practices have not always resulted in a sustainable forest-based economy or the protection of the forest environment. Neither have they always led to conditions of justice in the social environment. Since the publication of the report of the World Commission on Environment and Development in 1987, the term sustainable development has come into wide use.

The National Taskforce on Environment and Economy defines sustainable development as "development which ensures that the utilization of resources and the environment today does not damage prospects for their use by future generations"⁷. The Report of the World Commission on Environment and Development (The Brundtland Report) contained the following criterion for sustainable development: "At a minimum, sustainable development must not endanger the natural systems that support life on Earth: the atmosphere, the waters, the soils, and the living beings"⁸.

Both the traditional forestry term sustained yield and the newer, broader term sustainable development attempt to frame guiding principles for economic activity in the environment. Added to this debate about general principles are those principles which attach non-economic value to the environment, and further, those which argue for environmental rights apart from human values. The following section defines general environmental principles of forest land management.

⁷ Report of the National Taskforce on Environment and Economy, p.3.

⁸ World Commission on Environment and Development: Our Common Future. New York: Oxford University Press. 1987, p.45.

**WORLD
CONSERVATION
STRATEGY**

1.1 The company will, in its planning and operations, act in accordance with the objectives and principles of the World Conservation Strategy.

The World Conservation Strategy was conceived by the International Union for the Conservation of Nature and Natural Resources in cooperation with the United Nations Environmental Program and the World Wildlife Fund.

Its purpose is to provide "both an intellectual framework and practical guidance" for coping with the challenge of achieving economic development without damaging the environment.⁹

The three major objectives of the World Conservation Strategy are:

- a. to maintain essential ecological processes and life-support systems (such as soil regeneration and protection, the recycling of nutrients, and the cleansing of water) on which human survival and development depend;
- b. to preserve genetic diversity (the range of genetic material found in the world's organisms;
- c. to ensure the sustainable utilization of species and ecosystems (notably fish and other wildlife, forests and grazing lands) which support millions of rural communities as well as major industries.

The central themes of the World Conservation Strategy --- maintaining essential ecological processes, preserving genetic diversity and sustainable economic development --- are echoed and amplified throughout the code of practice. It is recognized as a broad and fundamental framework of environmental values. Abitibi Price, a major Canadian forest products company, has formally endorsed these principles.

One recommendation of the National Taskforce on Environment and Economy particularly emphasises the World Conservation Strategy principle of sustainable economic development:

Industry should, as a matter of principle, seek to operate responsibly in all jurisdictions, domestic and foreign, taking all reasonable precautions so that its operations are consistent with environmental protection and sustainable economic development. [NTFEE, p.9]¹⁰

⁹ International Union for Conservation of Nature and Natural Resources: World Conservation Strategy: Living Resource Conservation for Sustainable Development. Gland, Switzerland: IUCN-UNEP-WWF, 1980, page i.

¹⁰ A key to abbreviations used at the end of each policy statement is contained in Appendix I.

DEPENDENCE

1.2 The company recognizes that its continuing financial success is dependent on the health of the forest. It also recognizes that a healthy world, today and in the future, depends on maintaining the integrity of the forest environment and that the care of the forest is a global responsibility.

It is important to recognize that the health of the forest industry and communities associated with it relies on a healthy forest. As one consultation participant expressed it: forests sustain us; we don't sustain forests.

Lasting benefits from nature depend on the maintenance of essential ecological processes and life support systems, and upon the diversity of life forms, which are jeopardized through excessive exploitation and habitat destruction. [UNWCN]

The ecological significance of a particular forest can extend beyond its immediate locale. Thus, care of each forest area under company management is the local expression of a global responsibility. It is also the fulfilment of a responsibility to leave a healthy diverse forest upon which future generations will depend.

PRIMARY
CONSERVATION

1.3 The company recognizes the intrinsic value of the forest environment (soil, water, air, flora, fauna) in addition to its economic and social value.

Do we recognize "environmental rights"? Does a species or ecosystem have a right to exist apart from its utility to us? Or do we value the environment only in relation to ourselves? This was not an area of general agreement at the consultation. The Swedish company SCA SKOG AB makes the case in its environmental policy that ecosystems do have intrinsic value:

Environmental values...include the conservation of flora, fauna, water and soil, and also of our cultural heritage. There is an intrinsic value [emphasis added], regardless of immediate benefit to man in protecting endangered species and environments, and in preserving the forest as a habitat. We have a common obligation not to leave the world a poorer place than we found it. [SCA Skog]

Similarly, the United Nations World Charter for Nature and the World Commission on Environment and Development (The Brundtland Commission) note that:

The diversity of species is necessary for the normal functioning of ecosystems and the biosphere as a whole. The genetic material in wild species contributes billions of dollars yearly to the world economy in the form of improved crop species, new drugs and medicines, and raw materials for industry. But utility aside, there are also moral, ethical, cultural, aesthetic, and purely scientific reasons for conserving wild beings. [WCED, p.13]

Every form of life is unique, warranting respect regardless of its worth to man, and, to accord other organisms such recognition, man must be guided by a moral code of action. [UNWCN]

ACCEPT ECONOMIC
COSTS OF
ENVIRONMENTAL
CODE

1.4 The company accepts that costs may be incurred and investments may be required to meet the spirit as well as the letter of the code.

Protection of the integrity of forest ecosystems and good stewardship of our forests may, at times, require economic investments which show no immediate return. Some of those who offered comments on the code felt that it was on this point that a voluntary code of practice would fail because the pressure on company personnel to minimize the cost of wood delivered to the mill remains the most significant influence on logging operations.

This principle has both large-scale and small-scale aspects. On the large-scale: can harvesting continue at the current rate without degrading the forest ecosystem, including its ability to produce timber for industrial uses? In several provinces, the rate of forest harvesting is the subject of active public debate. Industry can earn increased short-term financial returns, governments can meet economic development and revenue objectives, and higher levels of short-term employment can all be achieved by excessive rates of harvest. Where this occurs, the World Conservation Strategy suggests the following:

7.4 Reduce excessive yields to sustainable levels. Industries, communities and countries that are over-exploiting living resources on which they depend would be better off in the medium and long term if they voluntarily reduced yields to levels that are sustainable. In this way they could adjust to realistic levels of consumption and trade and avoid unexpected drops in yield, instead of being surprised by them when they occurred. The economic distress that involuntary unscheduled cuts may cause is avoidable by the planned reduction of utilization to sustainable levels. [WCS]

Some companies' policies address depletion and over-harvesting by linking sustainability with intensive silviculture. The Swedish company SCA Skog AB notes that:

By applying optimum forestry policies we can gradually improve our forests and enhance their yield. In the long term they can be much more productive than they are today. We intend to make them so, while at the same time taking care not to damage the natural forest environment. [SCA Skog]

Critics argue that intensive silviculture is largely untried in Canada and can not yet be relied upon to guarantee large-scale benefits in the future. The environmental consequences of some intensive silvicultural techniques such as pesticide and fertilizer application, and the planting of large areas with a single species of tree (plantation monoculture) have also been the object of criticism. Both belief in and scepticism of the benefits of intensive silviculture were voiced at the consultation. Opinions about the seriousness of depletion and over-harvesting corresponded to opinions about the ability of intensive

silviculture to achieve desired future yields without harming the environment and the willingness of government and industry to fund such a programme.

On a small scale, how does a company respond when protection of an environmental feature is not required by law and will result in increased wood supply costs to the company? Should a company spend more than is required by law in order to preserve part of the ecosystem, e.g. to build a more expensive stretch of road?

The National Taskforce on Environment and Economy recognized that occasions will arise when environmental protection will increase costs:

Increasingly, industry finds that environmental and economic benefits can be complementary. At times, however, environmental benefits entail substantial expenditures and this should be recognized as a cost of doing business. In both cases, corporations show leadership by fulfilling their responsibility to conserve resources and protect the environment.
[NTFEE, p.6]

**SHARED
RESPONSIBILITY
WITH GOVERNMENT**

1.5 Where it operates on crown land, the company recognizes that responsibility for management is shared with government. The company will comply with government regulations and guidelines to protect the environment. The company will encourage high standards of environmental protection through government regulation where appropriate.

Most forest land in Canada is owned by the crown. Provincial governments allow private industry access to timber on crown forest land through a variety of licensing arrangements which assign differing levels of management responsibility to private industry. How does industry perceive environmental protection regulations? Are they seen as a burdensome cost to be minimized or avoided?

Participants at the consultation differed in opinion regarding the appropriateness and effectiveness of current levels of government regulation but all acknowledged the crucial role governments play in setting standards of environmental protection.

The Canadian Pulp and Paper Association, in its 1989 Environmental Statement stated:

The industry will work with governments in the development of regulations and standards based on sound, economically achievable, technologies and the analysis of environmental impacts. [CPPA]

**BEHAVIOUR NOT
LIMITED TO LEGAL
OBLIGATIONS**

1.6 The company will not limit its responsibility to the environment solely to what is required by law but will continually strive to exceed the requirements of law in meeting the objectives of this code.

Hopefully, to say that a company will abide by the law states the obvious. Several companies have a policy similar to that of Fletcher Challenge Canada which states that the company "will meet or exceed all government requirements applicable to its operations." But how does the role of an environmental code of practice differ from the role of government regulations?

A code can assist industry to respond to situations where appropriate regulations do not exist or are inadequate.

One consultation participant noted that government regulations may have more public credibility than internal codes and that the increasing degree of regulation may eliminate the need for a code. However, other participants noted that regulations often define a minimum rather than an optimum standard of environmental protection, leaving a great deal of room for companies to act on their own initiative. As the National Taskforce on Environment and Economy notes, "Codes of practice can be used to establish internal goals and performance standards for industry on environmental matters which go beyond minimum regulatory requirements..."¹¹

It was also noted that excessive government regulation can be avoided by effective self-regulation.

**ABORIGINAL AND
TREATY RIGHTS**

1.7 The company will respect the title and rights of aboriginal peoples and will not engage in new or accelerated industrial development, including forest harvesting, on unsurrendered lands without agreement with the affected native people. On land where treaty rights exist, the company will actively seek and accept the participation of aboriginal peoples in managing the protection of the environment.

Timber harvesting in many regions of Canada occurs on land subject to disputed aboriginal title. The major Canadian churches have clear policies on aboriginal rights which call for no new industrial development on land subject to unsettled aboriginal land claim without agreement with native people or settlement of aboriginal claim. Timber harvesting also occurs on Crown land on which treaties have conferred special rights to native people.

Aboriginal and treaty rights are included in the environmental code of practice because of the fundamental social justice issues raised by the impact of forest land management on native communities. Some consultation participants did not

¹¹ Report of the National taskforce on Environment and Economy, p.6.

agree and took a position like that of the Canadian Petroleum Association which explicitly excluded aboriginal land claims from its environmental code of practice:

The association recognizes that the word 'environment' can be defined very broadly; however, in this Code the term is restricted to the natural environment and its influence on public health and safety. Therefore, this does not deal with such subjects as socio-economic affairs and native land claims. [CPA]

Other consultation participants, however, felt strongly that a statement on aboriginal rights belonged in the code.

Granting of timber rights to industry by provincial governments on land where aboriginal title is unresolved or where native communities are guaranteed certain rights by treaty has at times created serious land use conflicts. Current processes for resolving land use conflicts between the forest industry's timber harvesting rights and native communities' aboriginal and treaty rights do not adequately reflect the rights of native communities. Joint management structures may offer a means of resolving such conflicts.

FOREST
DEPENDENT
COMMUNITIES

1.8 The company recognizes its responsibility to provide affected communities with advanced public notice of changes to operations which will result in reductions in employment. The company will consider the social consequences of forest management and will make a positive contribution toward the economic well being and quality of life of forest-dependent communities.

Communities quickly grow up beside timber harvesting operations and conversion plants. Often, these communities depend solely or predominantly on the operations of a single company, bringing to the company special social responsibilities. Company responsibility can be expressed by, among other things, sustaining wood supply through proper harvest and renewal.

The Canadian Paperworkers Union's Forest Policy notes that:

Neglect of the forest leads to unemployment, social decay and dislocation with all the attendant costs. This of course, reflects our dependence on its use. In contrast, proper stewardship of the resource base can help to ensure regional economic vitality and stable growth in employment and income. [CPU]

And Abitibi Price's Forest Management policy states:

Responsible forest management involves not only forests and mills but also people and their communities ... We also believe in listening to their concerns, gaining their support and understanding, and explaining our programs and policies. [Abitibi Price]

Policies should be aimed not at locking in the status quo but at maintaining a healthy forest with the flexibility to respond to changing economic and market situations.

**PROCESS FOR
RESOLVING
CONFLICTS**

1.9 Where conflict over forest use or management arises, the company will seek to resolve those conflicts through processes which recognize the public's right to participate in decision-making.

Recognizing that disagreements between forest stakeholders over land allocation and management are increasingly common, companies should seek means of constructive debate and conflict resolution. Such forums must allow for active participation by all interested stakeholders, with access to all the relevant information. Companies have a responsibility to participate in debates about land use and land management in a spirit of cooperation.

One consultation participant spoke of a "multi-stakeholder problem-solving decision process" through which all parties negotiate a resolution to the conflict. The National Taskforce on Environment and Economy recommends that "Government, industry, and non-governmental organizations should use multi-partite processes to deal with specific issues, projects and programmes."¹² Such a process implies some level of agreement in advance to abide by the outcome.

Another participant stressed using a "problem solving model rather than an adversarial model" in conflict situations. Many participants drew a connection between the resolution of conflict and both public access to information and the sharing of decision making power.

Two policy statements point out the need for the public to participate in the forest land use planning and to have access to the information required to participate:

Northwood encourages informed public involvement in the forest planning process. [Northwood, p.4]

26. Industry should provide input to balanced and informed public discussions. [ICC, p.10]

B. LAND USE DECISION MAKING

Forested land in Canada can and should support many different uses, integrated across time and space and varying in intensity and scale. Land use decisions allocate how forested land should be used.

The decision whether forested land should be allocated to industrial production of timber requires careful and thoughtful assessment of potential uses as well as the biological and economic capabilities of the land.

Land use planning is most commonly carried out by provincial government agencies with forest industries as major parties to this process.

¹²ibid., p.5.

**INTEGRATED USE
OF FOREST LAND**

2.1. The company recognizes that on some lands with the potential for commercial timber production, other forest uses and environmental conditions may preclude harvesting or require modified harvesting.

Timber harvesting and management is but one use of forest land. Other uses include wilderness, ecological reserves, sensitive ecosystems and watersheds. The vulnerability of certain sites to harvesting practices may preclude sustainable forest production. Such sites should be excluded from harvesting operations. Companies should recognize the variety of legitimate interests and perspectives on the appropriate allocation of forest lands.

The following two policy statements elaborate:

In some smaller areas and in special circumstances, it may be necessary to exclude certain forestry operations or to exempt land altogether from commercial forestry. Such concessions to the interest of nature conservation may, for example, have to be made in places near the tree line, near human habitation, or preserved as gene banks. Land may be totally exempted from forestry operations to protect unique biotopes or species with special needs or for other reasons. [SCA Skog]

5.6 Ensure that the principle management goal for watershed forests and pastures is protection of the watershed. ...Especially fragile and critical areas, notably steep slopes with erodible soils and the source areas of major rivers should never be cleared. In other areas, uses compatible with watershed protection may be permitted - provided the government is able to ensure that the primary management goal is respected. [WCS]

**PUBLIC ROLE IN
DECISION MAKING**

2.2 The company acknowledges the right of all stakeholders to participate in decisions about forest use and supports the principle of funding public groups engaged in the forest land use decision-making process.

Public participation is a critical part of forest land use decision making. Ways of sharing of decision making between various levels of government and communities of stakeholders is not well developed.¹³

An integral part of this decision making process is the provision of funding programmes. These give local communities and provincially oriented public interest groups an opportunity to express their desires and aspirations for the future of forest land before alternative land use options are lost.

The principles of shared responsibility and integrated decision making must become the foundation for our institutions and guide our key decision makers. [NTFEE, p.2]

¹³In the Temagami region of central northern Ontario and Clayoquot Sound on the west coast of Vancouver Island new structures and planning procedures have been created by Provincial governments to bring stakeholders together to resolve land use conflicts. See: Bob Nixon, "Winds of Change Toward Local-level Forest Control Creates Confusion in Industry", Forest Planning Canada, 5:5, p.31.

[Government regulation] should be the result of a consultative process which recognizes the views of all affected stakeholders. [CCPA, p.4]

**ACCESS TO
INFORMATION**

2.3 The company acknowledges the public's right of access to all relevant information, in a meaningful and understandable form, on which land use decisions are based.

Much time was spent at the consultation discussing the type of information which should be made available to the public by companies as part of decision making processes. Not all information is useful to the public. Too little or too much detail can render information difficult or impossible to use. Several consultation participants noted that governments can play as significant a role as industry in providing information and at times are less cooperative.

The Canadian Petroleum Association environmental code states:

Companies will provide relevant information in a timely fashion to the public and to governments with respect to corporate policies and activities and will be responsive and sensitive to community concerns. [CPA]

**IDENTIFY
ENVIRONMENTAL
VALUES**

2.4 The company will identify or encourage the government to identify all environmental values and ecosystems on land being considered for forest harvesting.

Prior to making land use decisions, careful and thoughtful assessment of the potential uses, and biological and economic capabilities of the land must be made. Companies, in cooperation with governments, should identify valued commercial and non-commercial ecosystems and ecosystem components in areas which they wish to use for commercial timber production. As one consultation participant pointed out, "we often don't know what's there. Therefore, we don't make plans that reflect the need for adequate levels of environmental protection." This applies to land management (see Section 3) as well as land use decisions.

The information to be gathered about environmental values and ecosystems should be determined by a scoping process in consultation with all stakeholders. Examples of what should be included are: an inventory of species; identification of any rare, threatened, or endangered species; aesthetic and scenic values; archaeological and cultural heritage sites; and particular habitats.

The Canadian Petroleum Association's code acknowledges the need to anticipate the environmental impact of projects to "ensure that impacts and risks are managed" and that environmental considerations join "economic, technical and operational evaluations as fundamental components of the planning and decision making process".

**ASSESS
CUMULATIVE
EFFECTS**

2.5 The company recognizes the requirement for assessment of cumulative environmental effects of all land use activities as a regular part of land use planning.

The cumulative effect on the environment of multiple forms of industrial development must be taken into account in land use planning. Forestry operations must be assessed in relation to hydro-electric, mining, transportation and other forms of industrial development on forested land, as well as the impact of acid rain and other atmospheric pollutants.

The point made about calculating maximum sustainable yield in the following passage from the Report of the World Commission on Environment and Development applies equally to all aspects of forest operations:

...most renewable resources are part of a complex and interlinked ecosystem, and maximum sustainable yield must be defined after taking into account system-wide effects of exploitation. [WCED, p.45]

C. LAND MANAGEMENT PRINCIPLES

Once forest land is allocated to the production of timber for industrial purposes, considerations move from if a forest will be managed for timber to how a forest is managed. Even when the primary land use is industrial timber production, social and environmental considerations should be applied.

In its forestry and nature conservation policy statement, the Swedish firm SCA Skog distinguishes between primary and secondary conservation. It defines the aim of primary nature conservation as to preserve the basic functioning of the environment (soil, water, air, flora, fauna, archaeological treasures). Secondary nature conservation means making the countryside accessible and attractive to other users.

**OPERATIONS
RESPECT LIMITS
OF FOREST
(PRIMARY
CONSERVATION)**

3.1 All forest activities, including silviculture, harvesting, protection, and improvement operations, will be guided by the inherent characteristics, biological capacity and diversity, and environmental quality of each ecosystem to maintain the resource at a biologically sustainable level.

Sustainable use of our forests means, first and foremost, that companies must operate within the limits set by the forest ecosystem. Only after these fundamental limits are recognized can we have a sustainable environment for people, including a sustainable forest industry.

The following policy statements qualify the idea of long-term sustainability in a variety of ways:

7.1 Determine the productive capacity of exploited species and ecosystems and ensure that utilization does not exceed those capacities [WCS]

Maximum economic utilization is to be made of the timber resource and it shall not be depleted nor diminished through excessive harvesting. Rather, efforts shall be made to maximize the quantity and quality of timber grown. [Fraser]

It is the policy of Abitibi Price to: ...apply the principles of responsible forest management to the forests under our jurisdiction to ensure a continuous long term supply of quality fibre to our dependent manufacturing plants... [Abitibi Price]

The primary policy to be followed in the management of the timber resource will be to produce the maximum amount of usable fibre per acre in the shortest possible time incorporating high standards of protection, utilization and silviculture [BCFP]

**INTEGRATED USE
(SECONDARY
CONSERVATION)**

3.2 The company will manage forests which are primarily dedicated to timber production in a manner which allows for a variety of benefits to society. Establishment by provincial governments of measurable management objectives for consumptive and non-consumptive uses on land and water in areas under company management will be encouraged.

While land being managed primarily for timber production can also be managed to provide other benefits, not all participants in the consultation agreed that the popular term "multiple use", as it is currently applied, is a workable concept. Some felt clearcutting, by far the most common harvesting method, is inherently "single use".

One participant noted that there is always a dominant, primary use. Some other uses may be compatible, but those uses which are non-compatible are degraded and eventually lost.

Timber supply planning and the establishment of measurable management objectives for both consumptive and non-consumptive uses are important tools to ensure that benefits other than timber production can be assessed.

Foresters and wildlife managers should cooperate in the review and development of forest, fisheries, wildlife, and integrated management. The National Forest Sector Strategy recommends the following:

- *establishment of short- and long-term objectives for forest wildlife;*
- *developing integrated planning processes;*
- *converting wildlife information into usable forest technology;*

- *implementing harvesting and silviculture practices and assessing the achievement of objectives in terms of wildlife responses; and*
- *the examination of costs and benefits to support the enhancement of wildlife habitats. [NFSS Recommendation #7]*

Recognition of the need to accommodate other uses on forest land is well represented in company policies:

Since other resources and users of forest lands are affected by the application of forest management, a multiple use plan forms an integral part of the program developed by the Company, bearing in mind, the principle requirement of the licence is to supply wood to processing plants. [Northwood, p.2]

...it is the intent of the Company to ... conduct its Woods Operations in a manner consistent with the concept of integrated resource management. [Weyerhaeuser Canada]

We are confident that through [sound forest] management, the forests entrusted to us will continue to provide sufficient fibre and other tangible and aesthetic benefits to meet the short and long term needs of both the company and society. [Abitibi Price]

Through long range planning and proper forest management practices, forest land will provide for the continuous production of fibre, the maintenance of the water and soil resources, the protection of the fisheries and wildlife resources and the development of the recreational resource. [BCFP]

Provisions for forest recreation and other social considerations are to be made to the extent of Fraser's social responsibility. [Fraser Inc]

COMPREHENSIVE PLANS

3.3 Management objectives, procedures and operational standards, as well as environmental concerns and related mitigation requirements, for each management unit are to be specified in comprehensive management and working plans.

Companies will assess the potential effects of their projects and will integrate protective measures into the planning process to prevent or reduce impacts upon the environment and on public health and safety. [CPA]

MITIGATION

3.4 Company operations will be conducted in a manner which minimizes or mitigates adverse effects on the terrestrial and aquatic environment.

Some participants expressed the concern that a commitment to "minimize or mitigate" environmental damage could be interpreted as a reliance on repairing damage after the fact rather than preventing the damage in the first place. Yet when damage does occur, the commitment to repair it is important. The idea of

minimizing impact acknowledges that most forest operations have some disturbance.

...harvesting and managing of forests to strive for and maintain favourable environmental conditions by conducting its operations in a manner that causes a minimum of environmental change, while maximizing the economic recovery of usable fibre. [Weyerhaeuser Canada]

While developing the Company's timber resource, special attention is directed to minimize the adverse effects on fish and wildlife values. Management programs enhance other resources where feasible. [Northwood, p.4]

Environmental damage caused by company activities will be corrected in a timely and efficient manner. [CPA].

Harvesting and road building must also be conducted in a manner to minimize ecological damage. [CPU]

UNDERSTANDING
FOREST ECOLOGY

3.5 The company will seek to understand the structure, function and composition of the forest ecosystem in planning its harvesting and silvicultural operations.

MODIFY
PRACTICES

3.6 The company will modify or improve practices in the light of new knowledge and understanding of the forest ecosystem.

Wise forest use requires accurate knowledge of the forest's complex ecological relationships and the translation of new knowledge and understandings of forest ecology into operating practices. The forest's health and productivity depends on protection of soils and on genetic and ecological diversity. Ecological responsibility is a cornerstone of responsible forest management and operations.

Our incomplete understanding of forest ecology requires that we make decisions in the presence of uncertainty. The best available information should be used in identifying threatened ecosystems and in proposing measures to protect them.

Harvesting operations can be designed to incorporate uncertainty. Some foresters use terms such as "soft" or "wholistic" forestry to identify an approach which both attempts to integrate forest ecology and harvesting practices and recognizes our limited understanding of forest structure, function and composition.

As the World Conservation Strategy notes, "action based on inadequate knowledge carries a grave risk that it will fail or be unnecessarily destructive."¹⁴

¹⁴International Union for the Conservation of Nature and Natural Resources: World Conservation Strategy policy 12.4

Environmental factors and ecological interactions are to be considered during logging road construction and other forestry activities. Forest areas known to provide important and necessary shelter to wild animals are to be preserved or enhanced. [Fraser]

COMPREHENSIVE
INVENTORY DATA

3.7 The company will base its plans and operations on comprehensive inventory data including ecosystem classification, floral and faunal habitat (including aquatic resources) and forest structure, composition, growth and dynamics.

Normally, forest inventories focus on the age, volume and growth rates of merchantable tree species:

These inventories should include volume, age, species, site class, tree form and other information sufficient to provide growth and yield projections, production goal planning, and forest renewal strategies for each forest management unit... [CPU,p.4]

Accurate forest inventories, updated periodically, are required for effective forest management. These should provide specific information on volume, age, species, and condition of trees as well as site capability, growth and yield. Abitibi-Price cooperates with provincial governments to develop this information. [Abitibi Price]

Effective environmental protection and sustainable forestry require a more detailed forest inventories. A forest inventory not only gathers data to make economic decisions about harvesting and silviculture. It is also a tool for environmental protection.

The data collected in forest inventories must be related to management objectives and provide knowledge of the basic characteristics of forest ecosystems so that planning can effectively anticipate and prevent problems and monitoring can evaluate performance. Forest inventories must include ecosystem classification (accounting for factors such as climate, soil, and hydrology), as well as forest structure, composition, and function.

The need to inventory environmental values beyond those directly associated with harvesting timber is included in the policy of SCA Skog AB:

If the objectives are to be achieved, it is essential to know what needs to be protected. The presence of rare and endangered plants and animals must be known of before appropriate action can be taken. Such knowledge is filed in our forest records. We must all be aware of our responsibility to call attention to things in need of protection, and here we count on getting help from interested parties --- both organized and individual --- who know of endangered environments. [SCA Skog]

ASSESS IMPACT
OF ALTERNATIVES

3.8 The company will assess the impact of alternative management procedures on all forest resources as an aid to resolving resource conflicts.

The sustainable level of all resources of the forest that may be obtained by alternative management procedures must be determined as precisely as possible. When alternatives are assessed, the relative costs and benefits of different options can be more clearly weighed. Where resource conflicts exist, such an assessment may point the way to resolutions.

RESEARCH

3.9 The company acknowledges its responsibility, shared with governments and universities, to address deficiencies in existing data and knowledge of ecosystem processes through the development and funding of research programmes, and to communicate the results of this work to all interested parties.

Industry, as well as government and universities, have an important role to play in supporting and carrying out forest research. The 1989 Environmental Statement of the Canadian Pulp and Paper Association commits its members to:

...continue to advance the frontiers of knowledge in environmental protection through the support of scientific research and, as appropriate, apply such knowledge at its facilities. [CPPA]

The Abitibi-Price policy on research states:

Development of better methods and procedures through well-planned and coordinated research programs is an essential component of long term forest management programs. Industry, universities and government should cooperate in the planning, implementation and communication of these research programs. [Abitibi Price]

PRIVATE LAND

3.10 Where company timber supplies come from private land not under their management, the company will encourage land owners to follow sound environmental practices.

RECYCLING

3.11 The company will actively promote recycling to reduce demand on forest resources.

By utilizing recycled paper, reliance on timber as a source of raw material for the pulp and paper industry can be reduced, thereby contributing to the conservation of forest land. Whether such a reduction is desirable depends on an assessment of the sustainability of current rates of harvest and of the opportunities for alternative forest uses.

If the existing rate of harvest meets criteria of sustainability and environmental protection, then a reduction in current levels of harvest may not be necessary. Recycling, in this case, primarily addresses a waste disposal problem and provides an opportunity to find alternate markets for the timber supply. However, in areas where the rate of harvest is above the sustainable level, where there is a requirement for environmental protection or where

opportunities for other forest land uses are preferred, recycling presents an important alternative supply option.¹⁵

CONTRACTORS 3.12 Contractors working on the company's behalf will
SUBJECT TO CODE be subject to the environmental code of practice.

D. IMPLEMENTATION, MONITORING AND ACCOUNTABILITY

Some means of implementation and review is a critical part of making an environmental code of practice usefulness. At the consultation, the comment was often heard: "It's what happens on the ground that counts". Expressed equally often was the importance of having senior management committed to the code. The Canadian Chemical Producers Association "Responsible Care" policy puts the case for this strongly:

The personal commitment, attention, and support of CEOs and board members to the program must be constant, purposeful and visible to the working levels in companies and the association. [CPPA]

Effective implementation and review procedures link strategic decisions made in the board room with what happens "on the ground".

IMPLEMENTATION 4.1 The company will undertake specific measures to implement the environmental code of practice, including modification of company practices to correspond with the code, establishment of measurable resource management objectives, and training and education of employees and contractors.

To be effective, an environmental code of practice for forest management must be reflected in all aspects of company planning and operations in the forest. Company policies must recognize that implementation requires training:

A comprehensive training programme both in the office and the field will be maintained within British Columbia Forest Products Limited to ensure that all woods personnel have an appreciation of the objectives of the Forest Practices Guide. [BCFP]

¹⁵The Ontario grocery chain Loblaws recently introduced a brand of bathroom tissue made from 100% recycled paper. Its label offers evidence of a public perception that purchasing recycled paper products will reduce the area of forest which is harvested: "Every year in Canada we destroy a forest the size of P.E.I. to produce paper and paper products. By buying bathroom tissue and other products made from 100% recycled paper, you are saving the natural forest."

**ANNUAL REVIEW
AND REPORT**

4.2 The company will annually review and report on its performance with respect to the environment code of practice and make this report available to Directors, shareholders, employees, appropriate government agencies and the general public. The company will make a deliberate effort to identify local community groups effected by company operations and make information contained in the report will be presented on an area basis corresponding to management agreements and tenures. The report will address the achievement of resource management objectives and standards of forestry practice and will be signed by a registered professional forester or forest engineer (in appropriate provinces). Corrective action will be taken to address deficiencies identified in the annual report.

**CLEARLY ASSIGN
RESPONSIBILITIES**

4.3 The company will clearly assign responsibility for development, implementation, testing, annual reporting, periodic auditing, updating of practices and procedures and taking corrective action regarding the environmental code of practice.

**UPDATING
PROCEDURES**

4.4 Procedures will be established for revising and updating the code of practice and company plans and procedures to take into account results of the annual review.

The recommendation of the National Task Force on Environment and Economy on annual reviews and reports on environmental practice and the implementation of environmental codes of practice is explicit. However, the task force recommendation limits this reporting to the board of directors.

The 1989 Environmental Statement of the Canadian Pulp and Paper Association commits it member companies to:

...report regularly to their Boards of Directors on their environmental status and performance. [CPPA]

Consultation participants expressed differing views on whether company environmental reports should be made public. Some felt that companies' proprietary information should be protected and that reviews would be more thorough if they were confidential. Others pointed out that public confidence in the reviews would be much stronger if they were not confidential.

Equal in importance to effective reporting is the clear assignment of responsibility for the code within the company. One participant used the term a "paper trail of responsibility" to describe this internal accountability.

Noranda Group operations will be subject to periodic environmental, health, hygiene, safety and emergency preparedness audits. ...A report on environment, health and hygiene, safety and emergency preparedness will be presented annually to the Board. [Noranda]

All MacMillan Bloedel operations will be subject to internal audits respecting environmental performance and a corporate status report will be presented annually to the Board of Directors. [MacMillan Bloedel]

[The Canadian Chemical Producers Association] accepts the legitimacy of progress monitoring systems as an inherent component of these activities. [CCPA, p.4]

While most corporate environmental reporting or auditing is internal, the Valdez Principles, adopted in the wake of the Exxon Valdez oil spill in Alaska by the U.S. Coalition for Environmentally Responsible Economics (which includes a number of public pension funds and financial institutions), call for public reporting of environmental performance:

10. Assessment and Annual Audit. We will conduct and make public an annual self-evaluation on our progress in implementing these principles and in complying with all applicable laws and regulations throughout our world wide operations. We will work toward the timely creation of independent environmental audit procedures which we will complete annually and make available to the public. [Valdez Principles]

INDEPENDENT ENVIRONMENTAL AUDITS

4.5 The company will provide for the conduct of periodic audits of their implementation of the environmental code of practice by an independent auditor.

Periodic independent audits of the implementation of the environmental code of practice provide a valuable tool for improving company environmental performance and, at the same time, increase public confidence in the company's compliance with the code. Such audits should include timber management, fish and wildlife, recreational use and aboriginal land rights.

Some consultation participants felt the code would be most successful if it was self-regulating while others expressed strong reservations about a company's ability to objectively evaluate its own performance. The review procedure outlined here combine annual internal reviews [#4.2 above] with less frequent external audits as a means of answering both concerns.

These audits may coincide with government reviews of licence agreements such as Forest Management Agreements or Tree Farm Licenses. The results of the audit should be made public in a "State of the Forest" report which also describes company plans for the next review period.

Environmental audits (reviews) will be systematically conducted by each company. The results of the audit will be confidential and will be the responsibility of the corporate officers. These audits will be used by the company to assess their compliance with corporate policies, government regulations and industry guidelines, and to identify deficiencies and develop programs for improvement. [CPA]

A Forest Auditor's Office should be created in each province, much like the Auditor-General who monitors public finances. ...the provincial Forest Auditor should have an adequate budget and staff to be totally

independent of resource ministries, local operating authorities and wood-using industries. The Forest Auditor should inspect and monitor all reforestation efforts on public and private lands, reporting results annually. [CPU]

INFORMATION

4.6 The company will make information about its operations and environmental performance available to the public. The company will make an effort to identify local community groups effected by company operations and make information available to them.

As a general principle, the company should make information about its operations and environmental performance available to the public. As well, a deliberate effort should be made by the company to identify groups in local communities most directly affected, and make the reports available to them.

Companies will provide relevant information in a timely fashion to the public and to governments with respect to corporate policies and activities and will be responsive and sensitive to community concerns. [CPA]

29. Industry should be prepared to supply information about possible environmental consequences of its operations, products and new developments, including socio-economic implications. [ICC]

**SUPPORT FOR
EMPLOYEE
CONCERNS**

4.7 The company will encourage employees to raise concerns about the environmental practices of the company.

Employees who fear for their job security or relations with supervisors will be negatively effected will be reluctant to draw environmentally damaging practices to the company's attention. By providing a means to hear employee environmental concerns, the company will be better able to ensure that its operations are consistent with the environmental code of practice for forest land management.

APPENDIX I. KEY TO POLICY STATEMENT ABBREVIATIONS

Abitibi Price	Abitibi Price, "Canadian Forest Management Policy"
BCFP	British Columbia Forest Products: "Statement of Policy on the Management of Forest Lands and Related Resources" [note: British Columbia Forest Products was renamed Fletcher Challenge Canada in 1988.]
CCPA	Canadian Chemical Producers Association: <u>Responsible Care: A Total Commitment</u> , 1988
CPA	Canadian Petroleum Association: <u>Environmental Code of Practice</u> , 1987.
CPPA	Canadian Pulp and Paper Association: <u>Environmental Statement</u> , 1989.
CPU	Canadian Paperworkers Union: <u>Forest Policy Statement</u> , 1986.
Fraser	Fraser Inc.: "Statement of Forest Management Policy"
ICC	International Chamber of Commerce: "Environmental Guidelines for World Industry", 1986.
MacMillan Bloedel	MacMillan Bloedel, "Environmental Policy", 1989.
NFSS	Canadian Council of Forest Ministers: <u>National Forest Sector Strategy for Canada</u> , 1987.
NTFEE	Canadian Council for Resource and Environment Ministers: <u>Report of the National Taskforce on Environment and Economy</u> , 1987.
Noranda	Noranda Inc.: "Environmental Policy".
Northwood	Northwood Pulp and Paper Ltd.: "Forest Management Policy".
SCA Skog	SCA Skog AB: "Forestry and nature conservation", 1987.
UNWCN	United Nations World Charter for Nature.
Weyerhaeuser Canada	Weyerhaeuser Canada Ltd.: "Timberlands Policy", 1986.
WCED	World Commission on Environment and Development (The Brundtland Commission)
WCS	International Union for the Conservation of Nature and Natural Resources: <u>World Conservation Strategy</u> , 1980.

APPENDIX II: CONSULTATION PARTICIPANTS

A Consultation of Environmental Codes of Practice for Forest Land Management was held in February 1989 at Toronto, Ontario. The model environmental code of practice and accompanying text do not represent a consensus of the views of participants in the consultation:

Ann Abraham, Anglican Church of Canada and chairperson, Taskforce on the Churches and Corporate Responsibility (TCCR); **Paul Aird**, Faculty of Forestry, University of Toronto; **Crandall Benson**, RPF, Associate Professor of Forestry, Lakehead University, Thunder Bay, Ontario; **Rod Carrow**, RPF, Dean of the Faculty of Forestry, University of Toronto; **Peter Chapman**, Taskforce on the Churches and Corporate Responsibility (TCCR) staff; **William Clark**, Forest Economist, Canadian Forest Service, Chalk River, Ontario; **Paul Desrosiers**, Vice President Forestry and Energy, James MacLaren Industries, Inc., Buckingham, Quebec; **Julian Dunster**, RPF, PhD, consultant, Guelph, Ontario; **Vincent Gerardin**, forest ecologist, Min. de l'Environnement, Ste. Foy, Quebec; **David Hallman**, Department of Social Issues and Justice, United Church of Canada and chairperson of the Domestic Issues Committee, TCCR; **Peter Hamel**, National Affairs Consultant, Anglican Church of Canada and member, Domestic Committee, TCCR; **Susan Holtz**, consultant and former member of the National Task Force on Environment and Economy, Halifax, Nova Scotia; **Ray Hodgson**, Presbyterian Church in Canada and member, Domestic Committee, TCCR; **Don Huff**, Federation of Ontario Naturalists, Toronto, Ontario; **Moirra Hutchinson**, TCCR staff; **Roger Hutchinson**, Emmanuel College, Victoria University, Toronto, Ontario; **Keith Newman**, Research director, Canadian Paperworkers Union, Montreal, Quebec; **David Pfrimmer**, Director, Office for Public Policy and Governmental Affairs, Eastern Synod, Evangelical Lutheran Church in Canada, Kitchener, Ontario; **David Powell**, EthicsCan, Toronto, Ontario; **Marjorie Ross**, TCCR staff; **Fr. Ed Sheridan**, Jesuit Centre for Social Faith and Justice and member, Domestic Committee, TCCR; **Doug Skeetes**, forester, Willowdale, Ontario; **Jamie Swift**, author, Cut and Run, Toronto, Ontario; **Ray Travers**, RPF, forest specialist, Victoria, British Columbia; **Most Reverend Matthew Ustrzycki**, Aux. Bishop of Hamilton, Guelph, Ontario.

Note: RPF indicates Registered Professional Forester.

APPENDIX III: COMMENTERS ON DRAFT

In addition to consultation participants, the following people generously offered comments on earlier drafts of this document:

Dale Anderson, Regional Planner, British Columbia Forest Service, Nelson, British Columbia; Kenneth Armson, RPF, Toronto, Ontario; David Curtis, RPF, Toronto, Ontario; Arlin Hackman, World Wildlife Fund, Toronto, Ontario; Kenneth Hearndon, RPF, Vittoria, Ontario; Paul George, Western Canada Wilderness Committee, Vancouver, British Columbia; Richard Greenwood, RPF, Ministry of Natural Resources, Thunder Bay, Ontario; Duncan MacDonald, Ontario Federation of Labour, Toronto, Ontario; George Marek, RPF, Beardmore, Ontario; Bob Nixon, editor, Forest Planning Canada, Victoria, British Columbia; F.L.C. Reed, Faculty of Forestry, University of British Columbia, Vancouver, British Columbia; Allen Roy, Chiefs of Ontario, Toronto, Ontario; Carl Schenk, Georgetown, Ontario; V.G. Smith, Faculty of Forestry, Univeersity of Toronto, Toronto, Ontario; Ron Woznow, Vice President, Environment, Fletcher Challenge Canada, Vancouver, British Columbia.

Note: RPF indicates Registered Professional Forester.